

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

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| In re: JAMISON DYER | § | Case No. 24-80163-G-13 |
| | § | |
| | § | Chapter 13 |

MOTION TO SUBSTITUTE COUNSEL

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD BE NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now, Jamison Dyer, hereinafter “Debtor”, by and through the undersigned counsel and files this Motion to Substitute Counsel and would show this Court as follows:

1. Debtor filed a chapter 13 case on May 31, 2024.
2. Debtor was originally represented by Susan C Norman (“Norman”), but after communications has decided to engage Reese W. Baker and Baker & Associates to represent him in the above chapter 13 bankruptcy case and to act as the attorney of record.
3. Baker & Associates contact information is as follows:

Reese W. Baker
Texas Bar No. 01587700
Nikie Marie López-Pagán
Texas Bar No. 24090233

Sonya Kapp
Texas Bar No. 11095395
950 Echo Lane, Suite 300
Houston, Texas 77024
(713) 869-9200
(713) 869-9100 Fax
Email: courtdocs@bakerassociates.net

2. Debtor and Norman has approved and requested this substitution. Debtor does not seek the substitution of counsel for delay.

WHEREFORE, Debtor requests that the Court enter an order substituting Reese W. Baker and Baker & Associates as counsel for the Debtor, and grant such other additional relief, at law or in equity, to which the Debtor may be justly entitled.

DATED: November 12, 2024

Respectfully submitted,

/s/ Reese W. Baker
Nikie Marie López-Pagán
Texas Bar No. 24090233
Reese W. Baker
TX Bar No. 01587700
Sonya Kapp
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950 Echo Lane, Suite 300
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ATTORNEYS FOR DEBTOR

Approved:

/s/Susan C. Norman
Susan C. Norman
P.O. Box 55585
Houston, Texas 77255

/s/Jamison Dyer
Jamison Dyer

CERTIFICATE OF SERVICE

I certify that on or about November 12, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/Reese W. Baker

Reese W. Baker